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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

IGNACIO VALENCIA,

Defendant.

CASE NO. 2:25-cr-00016-JAM

**STIPULATION AND ORDER TO CONTINUE
STATUS CONFERENCE, TO CONVERT
STATUS CONFERENCE TO CHANGE OF
PLEA HEARING ON SEPTEMBER 23, 2025,
AND EXCLUDE TIME**

DATE: September 9, 2025
TIME: 9:00 a.m.
COURT: Hon. John A. Mendez

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendant Ignacio Valencia, by and through his counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for a status conference on September 9, 2025.
2. On September 3, 2025, defense counsel notified the government that the defendant would like to change his plea. Defense counsel also notified the government that she needs additional time to meet with her client prior to his change of plea hearing.
3. By this stipulation, the parties now move to **continue** the status conference to **September 23, 2025, at 09:00 a.m.**, and **convert it to a change of plea hearing**.
4. Based upon the foregoing, the parties agree time under the Speedy Trial Act should be excluded of this order's date through and including September 23, 2025; pursuant to 18 U.S.C. §3161 (h)(7)(A) and (B)(iv) and General Order 479, Local Code T4 based upon defense counsel's request for

1 additional time to meet with her client.

2 5. Both parties also agree that the ends of justice served by the Court granting this
3 continuance outweigh the best interests of the public and the defendant in a speedy trial.

4
5 IT IS SO STIPULATED.

6
7
8 Dated: September 4, 2025

MICHELE BECKWITH
Acting United States Attorney

9
10 /s/ NICOLE M. VANEK
11 NICOLE M. VANEK
Assistant United States Attorney

12
13 Dated: September 4, 2025

/s/ SHARI RUSK
14 SHARI RUSK
15 Counsel for Defendant
16 IGNACIO VALENCIA

17
18 **ORDER**

19 IT IS SO ORDERED.

20
21 September 04, 2025


22 JOHN A. MENDEZ,
23 SENIOR UNITED STATES DISTRICT JUDGE